

1 BY MR. SCHELTEMA:

2 Q. The diagram looks as follows: it says Allentown
3 NXX. LCA is under that. And then it is Verizon local
4 customer and a little electric arrow. And it goes to
5 Philadelphia NXX in the Philadelphia local calling area
6 and there is the GNAPs point of interconnection and on
7 the GNAPs customer.

8 A. Yes.

9 Q. Now, when Verizon's local customer places this
10 call will Verizon pay Global NAPs access or reciprocal
11 compensation?

12 A. Okay. If it is what I would characterize as a
13 toll call from the Allentown location to the Philadelphia
14 location that would be a typical toll call as I
15 understand it.

16 Q. The presumption is that the Allentown NXX is
17 610 and Philadelphia is 215.

18 A. Right. I'm just establishing my current
19 understanding. They are disparate areas. They are not
20 local calling areas. They are toll calls normally.

21 So based on that understanding if I was an
22 Allentown customer making a normal call to a Philadelphia
23 customer that would be a toll call so the carrier that is

24 carrying the call whether it is us or somebody else would
25 be entitled to the toll charge. They would be receiving

1 it is...?

2 MR. SCHELTEMA: The answer is access.

3 THE WITNESS: Yes. But I wanted to define the
4 conditions.

5 JUDGE SMOLEN: That's fine.

6 BY MR. SCHELTEMA:

7 Q. On this next diagram I want you to take a look
8 at there is Allentown at the top and it says VZ local
9 customer for Verizon. And here we have traditional FX to
10 Philadelphia. Do you see that one?

11 A. Yes. I am looking at it and trying to
12 understand who the FX is being provided by.

13 Q. The FX is being provided by Verizon.

14 A. So there is a Verizon Philadelphia customer
15 that has purchased a FX presence?

16 Q. I'm sorry. There is a Verizon Allentown
17 customer that has purchased a presence in Philadelphia.

18 A. Okay. That is what I was trying to clarify.
19 Okay.

20 Q. And he is placing a call to another Global NAPs
21 customer also in Philadelphia with a 215 NXX code. In
22 this case does access apply or reciprocal compensation?

23 A. I need to be clear about how I answer this

24 because it is going to have a bearing on where you are
25 going with the discussion.

1 Q. Sure.

2 A. Our billing system as I understand it will
3 handle it one way. In other words, our billing system is
4 built to respect what appears to be local calls to local
5 calls. From a billing system perspective it will treat
6 it one way. But whether or not I believe it is
7 appropriate to do it that way would be a different story.

8 Q. What are you going to pay Global NAPs?

9 A. Once again, if we are starting with a customer
10 physically located in Allentown that has purchased a
11 presence in Philadelphia our billing system, as I
12 understand it, since it would look like it is originating
13 and terminating on a local basis would be handling that
14 as a reciprocal compensation call.

15 Q. Is that what you are going to be paying Global
16 NAPs?

17 A. That is what our system would automatically do,
18 as I understand it.

19 Q. Is there a manual override or --

20 A. No, no. I am trying to characterize the way
21 our systems were designed. Our systems were designed to
22 handle traffic based on carrier to carrier with the
23 understanding that traditionally those numbers would have

24 been associated with those physical distinct areas.

25 Q. You are not proposing anything different here,

1 are you? So reciprocal compensation is what gets paid to
2 Global NAPs?

3 A. That is my understanding is what would happen.

4 MS. NEWMAN: I have a question. Are you suggesting
5 that the GNAPs customer has purchased the FX service from
6 Verizon's tariffs?

7 MR. SCHELTEMA: No. Verizon's local customer
8 customer has purchased FX to get a Philadelphia 215 NXX
9 code.

10 THE WITNESS: So we are all together here, it is my
11 understanding, just to be sure we are perfectly clera, it
12 is my understanding that if I am standing in Allentown
13 and this is the customer that we are talking about,
14 appearing on their phone would be a number that appears
15 to be local in Philadelphia because they paid for the
16 transport to carry the call from Philadelphia back to
17 Allentown. They are paying us a rate for that transport.
18 So the actual presence is in Philadelphia and it appears
19 to be a local call terminating to a local number. So for
20 that reason it would be treated as a reciprocal
21 compensation call.

22 MR. SCHELTEMA: That is consistent with your answer
23 and with my design of the hypothetical.

24 Do you understand that, Kim?

25 MS. NEWMAN: I'm sorry. Where does the GNAPs

1 customer come in?

2 MR. SCHELTEMA: The GNAPs customer is the customer
3 who is receiving the call. He has not purchased
4 anything. He is just the end point of the call.

5 MS. NEWMAN: Okay.

6 THE WITNESS: He is just physically located in
7 Philadelphia as I understand it.

8 JUDGE SMOLEN: So the answer to that is reciprocal
9 compensation?

10 MR. SCHELTEMA: Reciprocal compensation.

11 JUDGE SMOLEN: Is that correct?

12 THE WITNESS: Yes, sir, it is.

13 BY MR. SCHELTEMA:

14 Q. The next one I have is Allentown and it says VZ
15 local customer and it says leased transport.

16 A. What is leased transport?

17 Q. I will get to that.

18 A. Okay.

19 Q. Here we have a Global NAPs customer and the
20 Global NAPs customer buys traditional FX to Allentown
21 from Global NAPs with the leased transport paid by Global
22 NAPs. So in this case we have sort of the reverse where
23 Global NAPs is providing the traditional FX.

24 A. Can you define how they provide the leased
25 transport portion of it? So we've got a traditional

1 vanilla favored FX service? Not a virtual --

2 Q. We are doing exactly the reciprocal of the
3 previous circumstance.

4 A. Okay. I wanted to be sure on how the transport
5 is being accomplished.

6 Q. Now, here the Allentown Verizon customer dials
7 the Global NAPs customer who has a point of presence and
8 an Allentown NXX code.

9 A. Okay. In Philadelphia on the GNAPs customer's
10 phone I would see a number, a NXX combination, that would
11 appear to be local to the Allentown customer?

12 Q. It would be a 610.

13 A. Okay.

14 Q. Will this be access or will this be compensated
15 with reciprocal compensation?

16 A. My understanding again, if the Verizon local
17 customer is dialing the customer physically located in
18 Philadelphia and reaching what appears to be a local
19 number it will be treated from a billing system
20 perspective as a reciprocal compensation call.

21 Q. Do you propose anything different than what the
22 billing system would do?

23 A. Not based on this because we are getting our

24 compensation for the transport being provided versus via
25 a leased loop.

1 Q. Well, you know, I could be leasing it from MCI.

2 A. You could be. Well, somebody is getting
3 compensated for the transport being provided. We would
4 not be carrying the traffic. We would hand it off to MCI
5 or whomever.

6 Q. Does it matter if a third person or Global is
7 self-providing the facilities versus Verizon getting the
8 revenue?

9 A. I think the distinction I have made in the
10 testimony and other activities says we are very concerned
11 about the transport cost, the fact that it is being
12 transported outside the local calling area. So it is
13 significant to me how it is provided, if it is provided
14 virtually versus literally by somebody carrying the
15 traffic from point to point.

16 Q. The next diagram. In Allentown we have a
17 Verizon local customer and GNAPs' point of
18 interconnection is also in Allentown.

19 A. Okay. I see that.

20 Q. The Global NAPs customer is actually located in
21 Philadelphia. You drop off the traffic and transfer it
22 to Global NAPs at the point of interconnection within the
23 Allentown local calling area.

24 A. I see that.

25 Q. Are you going to pay me reciprocal compensation

1 or access?

2 A. Well, if I am following the example correctly
3 you've got a Verizon local customer dialing outside of
4 the local area, is that correct?

5 Q. Uh-huh.

6 A. And they are terminating in Philadelphia. So
7 what I think should be appropriate if I understand the
8 example is that we would be charging access --

9 Q. Wait a second.

10 A. I'm trying to be sure I understand the example.

11 (Witness perusing document.)

12 A. I'm trying to establish the location of the
13 GNAPs customer. My understanding is they would be
14 physically located in Philadelphia.

15 Q. Yes. But he has an Allentown virtual NXX.

16 A. Which is not allowed, as I understand it, in
17 Pennsylvania under --

18 Q. We are all going through hypotheticals here.

19 A. So we are saying that the law does not apply?

20 Q. Suspended animation.

21 A. Okay. I was just trying to be clear on what I
22 understand the situation to be.

23 So hypothetically you are saying that that type of

24 assignment is allowed in Pennsylvania and the GNAPs

25 customer is allowed to get a virtual NXX assignment in

1 Philadelphia?

2 Q. Uh-huh.

3 A. That presents itself as being an Allentown
4 number.

5 Q. Uh-huh. And GNAPs is actually carrying the
6 transport from Allentown to Philadelphia.

7 A. Well, they are carrying it from somewhere, it
8 looks like from somewhere within that location over. So
9 I would agree with that based on the picture. But in
10 terms of what is originating and terminating it appears
11 to be a toll call disguised as a local call based on the
12 assignment of the original NXX.

13 Q. Is it access or reciprocal compensation?

14 A. What I think should be applied and what our
15 system will do are two different things. I think what
16 should be applied is access. But what I think our system
17 will do based on the inability to distinguish virtual NXX
18 numbers, it would apply recip comp to it because the
19 system doesn't have a way to distinguish this without
20 enhancements.

21 Q. In the prior example which I had labeled III
22 you stated that recip comp applies. Is that what you
23 think should apply as well?

24 A. Based on my understanding of it, if there is
25 lead transport being provided, therefore it is

1 originating and terminating in two different -- I'm
2 sorry. Let me think about this. We've got it
3 originating and terminating in two separate areas. But
4 it is a true FX where there is being leased transport.

5 Q. But not necessarily to Verizon.

6 A. No. I understand. It could be to somebody
7 else that has facilities connecting the two.

8 Q. Or even to GNAPs' facilities?

9 A. That's true. They bought their own facilities
10 and they are providing the transport point to point. Let
11 me think about that for a minute. Now I am in the mode
12 of thinking about it in more detail. I'm sorry. I
13 thought I thought it through a minute ago.

14 Q. Take your time.

15 A. We've got a Verizon local customer initiating a
16 call outside of the local calling area but it is to a
17 true FX number. I think in this case I would probably
18 change my answer. I'm sorry. As I ponder it further.

19 JUDGE SMOLEN: Give the answer you believe to be
20 correct.

21 THE WITNESS: Yes. I'm sorry, sir.

22 I think as I am thinking it through we have talked
23 about this recently at work. We've got a system that's

24 built on the theory that when you terminate traffic to an
25 FX number it's going to look like local traffic and the

1 billing system is going to handle it that way. In truth
2 what I think should be appropriate is we should be
3 terminating it and treating it as what would normally
4 have access applied to it.

5 I'm sorry. Maybe I have to go back and rethink the
6 answer.

7 BY MR. SCHELTEMA:

8 Q. And that's --

9 JUDGE SMOLEN: Wait a minute.

10 Counsel's question was is your answer here what you
11 believe it should be or what it is.

12 THE WITNESS: That is what I am trying to
13 distinguish. We have a system that does things
14 automatically a certain way and it just does it. And we
15 haven't built it to contemplate these types of examples.

16 JUDGE SMOLEN: So that the record is clear maybe
17 you want give what it is and what you believe it should
18 be.

19 THE WITNESS: Okay. Let me do that.

20 Based on this example we've got a system that would
21 handle it one way. And I think in this case that it
22 would handle it as a recip comp termination.

23 JUDGE SMOLEN: So your testimony is that Verizon

24 handles it as reciprocal compensation?

25 THE WITNESS: Right. From a mechanized system

1 perspective, that's correct.

2 JUDGE SMOLEN: But your further testimony is what?

3 THE WITNESS: My further testimony is that our
4 systems have limitations built into them and if we had
5 the flexibility in the systems we would choose to handle
6 this not as a recip comp but as an access situation.

7 JUDGE SMOLEN: As long as we are doing this let's
8 be consistent. What about --

9 MR. SCHELTEMA: Example number two?

10 JUDGE SMOLEN: Yes. Let's go back to two. Give it
11 as it is and as it should be.

12 BY MR. SCHELTEMA:

13 Q. Let's start at the beginning. The very first
14 one, you said it was access.

15 A. Right. Because we've got a vanilla call.
16 We've got a call originating in Allentown and flowing
17 over normal inter-office facilities.

18 Q. And your answer hasn't changed? It should be
19 access?

20 A. It should be access, right.

21 Q. The next one we have recip comp.

22 JUDGE SMOLEN: Wait a minute. Before you go to the
23 next one, it is and should be?

24 MR. SCHELTEMA: Yes.

25 THE WITNESS: Yes.

1 BY MR. SCHELTEMA:

2 Q. The next one is where Verizon has traditional
3 FX service provided to its local customer.

4 A. Right.

5 Q. And you said it was reciprocal compensation.
6 And it is or should be?

7 A. Once again let me talk through this out loud to
8 be sure. We've got the Verizon local customer in
9 Allentown completing a call to a GNAPs customer that has
10 purchased an FX presence in the Allentown area. Is that
11 right?

12 Q. No.

13 A. Oh, I've got it backwards. I'm sorry.

14 Q. The Verizon customer has purchased a
15 Philadelphia presence.

16 A. Okay. So it's the other way around. We've got
17 the Allentown customer dialing a GNAPs customer. They
18 both presence-wise appear to be located in Philadelphia
19 because the Verizon customer has purchased a FX that has
20 a presence in Philadelphia.

21 Q. Yes.

22 A. So we've got the presence purchased over in
23 Philadelphia and it is originating physically in

24 Allentown but it is terminating in Philadelphia. And I
25 said a minute ago from a system perspective the system

1 will handle that as a local call because it originates
2 and terminates in what appears to be local to the system.

3 Q. Uh-huh.

4 A. And then we've got the question is there
5 anything different that would be handled here if we
6 looked at it from a broader perspective.

7 Q. The question is should be.

8 A. Right. Should it be different from that. Let
9 me think because I want to be more careful about my
10 answer.

11 We've got the Verizon local customer making the
12 call. They have got the physical facilities that they
13 bought and paid for carrying the traffic over to the
14 Philadelphia area. So they are compensating Verizon for
15 the carriage of the traffic. And then at the other end
16 we've got the physical central office where the actual
17 dial tone is drawn from. So in that case we've got the
18 call originating and terminating with that connection
19 between the two from the same local calling area from an
20 office perspective. But in truth, thinking about it from
21 the standpoint of the rules that apply to originating and
22 terminating to me, from my perspective, the access charge
23 rate should apply here.

24 JUDGE SMOLEN: So on that second one you say
25 Verizon handles it as reciprocal compensation but you

1 believe it should be access?

2 THE WITNESS: Yes, sir. And this is where it gets
3 finetuned because we haven't ever built our billing
4 systems around this type of scenario.

5 JUDGE SMOLEN: I think the next one he has already
6 handled.

7 THE WITNESS: Yes.

8 BY MR. SCHELTEMA:

9 Q. I think we are all the way up to number five
10 now.

11 A. Let me go back and make sure I am counting the
12 right pages. We've got Allentown-Philadelphia VZ local
13 on one side and a GNAPs customer with an Allentown NXX on
14 the other side.

15 Q. Yes, we do. And that is GNAPs' POI on the
16 local Philadelphia calling area side.

17 A. Right.

18 Q. In this circumstance is this access or recip
19 comp and what is or should be?

20 A. Let's walk through it again the same way.

21 Q. Please.

22 A. We've got the Verizon local customer initiating
23 a call. It is being terminated to a GNAPs customer in a

24 different town.

25 Q. Yes.

1 A. The town that it is being terminated in has a
2 number that appears to be local to that town, is that
3 correct?

4 Q. Yes.

5 A. Okay. So we've got what I consider a
6 traditional --

7 Q. No. This is a virtual NXX scenario.

8 A. I'm sorry. With an Allentown NXX. Excuse me.
9 So it's a virtual NXX. So we've got a Verizon local
10 customer calling what appears to be from a Verizon local
11 customer's perspective a local number but in fact it is
12 being terminated remotely in a different town.

13 Q. Uh-huh.

14 A. So from that perspective I've got the local
15 customer completing what happens to be a local call. So
16 our system is going to treat it as a recip comp call.
17 That is how the system will deal with it because it won't
18 know the difference. But in truth I see that as an
19 access situation where an access charge should be
20 applied.

21 JUDGE SMOLEN: And this is the one you believe --
22 or Verizon believes -- that the law does not allow this?

23 THE WITNESS: That is my understanding. This type

24 of assignment based on the rules identified in the Focal
25 orders and also going back to the MFS-II it is my

1 understanding that virtual NXX assignment is not allowed
2 under those rules.

3 JUDGE SMOLEN: Next case.

4 BY MR. SCHELTEMA:

5 Q. Now we have Allentown and a Verizon local
6 customer -- this is number six -- an Allentown Verizon
7 local customer calls Philadelphia using a 500 number to
8 terminate the call to a Verizon ISP using IPRS.

9 A. Right.

10 Q. Now, is this recip comp or access?

11 A. Since it is all on Verizon's network and the
12 portion that connects from Verizon's local central office
13 -- which is not identified on here -- the portion from
14 the central office on the Allentown side to wherever the
15 hub exists -- and my guess is it is probably not in
16 Philadelphia but hypothetical it could be from a
17 hypothetical perspective -- that transport would be
18 provided as part of the product cost for the IPRS
19 service.

20 Q. Is there an access charge?

21 A. No. Once again it would not be a normal access
22 scenario since this is not regular local dialed traffic.
23 This is special traffic destined to an ISP. It is

24 handled over a private arrangement.

25 Q. I'm not sure what you mean by special. When a

1 Verizon customer dials a Global ISP customer is that
2 special or is that not special? What do you mean by
3 special?

4 A. What I'm distinguishing here is that the IPRS
5 service does not travel the same route that a Global call
6 would travel in this situation unless Global has
7 purchased the IPRS service, in which case we would work
8 that out with you.

9 Q. What I have in front of me is a scenario where
10 Verizon's, for lack of a better word, traditional network
11 is carrying the call beyond a local calling area --

12 A. Wherever the hub resides.

13 Q. -- before it turns into special.

14 A. Well, actually, from my perspective that
15 transport is a special transport arrangement that would
16 be included in the pricing of the product. Just like if
17 I leased a dedicated loop there is a special pricing
18 associated with a dedicated loop, that portion of the
19 transport is identified in the product tariff and in the
20 pricing that builds up to that product says this portion
21 of the transport is covered in the product price. We get
22 compensated for that very much like we do when it is FX
23 service and we get compensated for the transport.

24 Q. If I could have your indulgence for a moment.

25 A. Sure.

1 (Pause.)

2 Q. Let's go back to example number two.

3 JUDGE SMOLEN: Wait. Have you left this one yet?

4 MR. SCHELTEMA: Not entirely.

5 JUDGE SMOLEN: Because I have a question or two.

6 Let me ask it while we are still on it.

7 MR. SCHELTEMA: Sure. Absolutely.

8 JUDGE SMOLEN: On the one we were just on, how does
9 Verizon now handle this type of call? In terms of access
10 or reciprocal compensation? Answer first and then
11 explain.

12 THE WITNESS: Well, in terms of how it is handled,
13 it is all from what I term a private network, meaning the
14 IPRS service --

15 JUDGE SMOLEN: All right. Then I will change the
16 question. Is there a separate access charge or a
17 separate reciprocal compensation payable in this type of
18 situation?

19 THE WITNESS: No, sir. Because it all stays on our
20 network. It never leaves the network.

21 JUDGE SMOLEN: So nothing separate?

22 THE WITNESS: No, sir.

23 JUDGE SMOLEN: But you say that whatever charge

24 Verizon is entitled to is built in?

25 THE WITNESS: Yes, sir.

1 JUDGE SMOLEN: Okay. Go ahead.

2 BY MR. SCHELTEMA:

3 Q. But you haven't identified those charges?

4 A. I didn't bring a cost study with me. I don't
5 know whether the cost study would considered proprietary
6 or not but we do have a cost study that I have been told
7 about but I have not seen that identified those specific
8 line items.

9 Q. Now I am going to put you at a competitive
10 disadvantage because mine aren't stapled together. I
11 want you to hold II and IV next to each other.

12 A. I think I'll rip mine apart.

13 Q. Now in the case -- let's look at II first. In
14 II Verizon has the traditional FX and it is carrying the
15 call over its normal traditional network beyond the local
16 calling area.

17 A. Right. Yes.

18 Q. In case number IV Verizon is carrying the call
19 over its traditional network beyond the local calling
20 area. The hub is beyond the local calling area.

21 JUDGE SMOLEN: Are you talking about IV?

22 MR. SCHELTEMA: Yes, sir.

23 THE WITNESS: I'm following what he is saying, I

24 believe.

25 BY MR. SCHELTEMA:

1 Q. All right. Now, in both circumstances
2 Verizon's network, the traditional network, has carried
3 this call from one local calling area to another.

4 A. Right.

5 MS. NEWMAN: I am going to object to the form of
6 the question. You keep talking traditional. That hasn't
7 been defined.

8 MR. SCHELTEMA: Involving a private circuit. Does
9 that help you, Kim?

10 MS. NEWMAN: What are you saying is traditional
11 network? Are we talking the public switched network?

12 MR. SCHELTEMA: Yes. That's fine. Public switched
13 works for me.

14 (Pause.)

15 MR. SCHELTEMA: Let's just say the public switched
16 telephone network.

17 MS. NEWMAN: As opposed to a private dedicated
18 network?

19 MR. SCHELTEMA: Yes. For a moment -- well, give me
20 just a second to think about this.

21 (Pause.)

22 BY MR. SCHELTEMA:

23 Q. Your IPRS service you asserted earlier was a

24 private network, correct?

25 A. It is -- portions of it are totally private.

1 Other portions are treated in my definition of it as
2 private in the sense that it is dedicated from point to
3 point, meaning that the customer who is initiating the
4 call to the ISP provider -- whenever the ISP provider
5 comes to us and says I want to purchase that service it
6 is their understanding we are going to deliver
7 functionality. Part of that functionality is the
8 connection from the end office that the customer is tied
9 to, the originating customer, the linkage from the ISP to
10 the hub, and that hub may or may not be in the local
11 calling area.

12 Q. Okay. So now let's go to IV. The Verizon
13 local customer makes a call.

14 A. Yes.

15 Q. Within the Allentown local calling area you
16 have that local customers' end office.

17 A. Yes.

18 Q. From that end office within the Allentown local
19 calling area all the way to the hub, that is still the
20 private network?

21 A. It is facilities between those two points, yes,
22 and it is handled in a private sense.

23 Q. And how is that distinguished from the

- 24 traditional FX scenario in number II where you have a
- 25 dedicated or private network available to the customer?

1 A. I think the distinction is in number II we have
2 a typical FX arrangement which is a two-way service,
3 voice both directions is available. You could dial on it
4 and do a data communication if you chose. But it is
5 distinct from the other. The other is a one-way service.
6 It's not equivalent to an FX service. It is data one-way
7 to the hub and then from the hub on to the ISP provider.

8 Q. How does data get back to the person dialing?
9 If you are the local customer, when you send your URL,
10 please show me Ask Jeeves.com you're telling me it only
11 goes one way? Nothing ever comes back?

12 A. No. I'm saying that the communication is
13 established in an one-way means. There is no way for
14 somebody to dial in to this from Philadelphia, for
15 example. They can't phone-wise communicate back to that
16 customer in Allentown because it is focused on ISP
17 service. It's not focused on general voice service.

18 Q. Would you agree that when I hit the URL and I
19 send it across this private network to the hub and it
20 goes to Verizon On-Line and I say give me CNN.com that
21 CNN.com sure enough gets sent all the way back to the
22 Verizon customer?

23 A. There is a two-way data communication, yes. No

24 dispute on that. But I am simply saying that it's not a
25 two-way service in the traditional sense. I cannot dial

1 a customer over that connection.

2 Q. Now, if Global NAPs offers the same one-way
3 service to ISPs shouldn't it be treated similarly?

4 A. If they offered it under the same arrangements
5 facility-wise then we would need to look at that
6 separately, I think. That is not what I understood
7 Global NAPs' proposal to be, though.

8 Q. So in other words, if we set up a hubbing
9 system --

10 A. If you set up a hubbing system and provide some
11 payment to us for the transport from our central office
12 up to that hub, which is what this service does, we would
13 be willing to discuss that as an arrangement.

14 Q. Would you agree that there are many ways to
15 actually provision this kind of calling an ISP?

16 A. There are a variety of ways to connect to an
17 ISP, including non-dial arrangements. DSL or cable modem
18 works as well.

19 JUDGE SMOLEN: Before you go on, for the sake of
20 the record, in number IV there is no access charge
21 involved in this example?

22 THE WITNESS: No, sir. There is no recip comp or
23 access because it's not the type of service that --

24 JUDGE SMOLEN: I just want the record clear.

25 BY MR. SCHELTEMA:

1 Q. And you don't believe that there should be
2 anything different?

3 A. I think this is appropriate because it is a
4 separate arrangement.

5 Q. That was my understanding of your testimony
6 too.